U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION 9

CLEAN WATER ACT COMPLIANCE OFFICE

NPDES Permittee:	Robert Camozzi (unpermitted facility)
Facility:	Willow Creek Jerseys Ex. 6 Personal Privacy (PP) (Conditional Waiver of Waste Discharge Requirements Order R1-2012-0003)
Receiving Water:	Estero Americano tributaries
Date of Inspection:	April 17, 2014; 8:30 a.m.
Inspection Participants:	
U.S. EPA:	Glenn Sakamoto, CWA Compliance Office, (415) 972 - 3556 Becky Mitschele, NPDES Office, (415) 972 - 3492
California Regional Board:	Cherie Blatt, North Coast Regional Water Quality Control Board (707) 576 - 2755
Western United Dairymen:	Melissa Lema, Field Representative, (707) 779 - 2214
Gold Ridge Resource Conservation District:	William Hart, (707) 823 - 5244
Report Prepared By:	Becky Mitschele, US EPA Region 9
Report Date:	May 12, 2014

CAFO FACILITY INSPECTION REPORT

ATTENDEES: Glenn Sakamoto and Becky Mitschele (USEPA, Region 9), Cherie Blatt (Regional Water Quality Control Board 1, North Coast Region), Melissa Lema (Western United Dairymen), William Hart (Gold Ridge Resource Conservation District)

REPORT PREPARED BY: Becky Mitschele, USEPA, Region 9

FACILITY INFORMATION

Inspection Date:	**April 17, 2014; 8:30 a.m.**
Facility Name:	**Willow Creek Jerseys**
Facility Address:	**Ex. 6 Personal Privacy (PP)**
Authorized Official & Phone:	
Mailing Address of Authorized Official:	**Same as facility address**
NPDES #:	**Unpermitted**
On-Site Representative:	**Robert Camozzi, Owner**
Receiving Water(s):	**Estero Americano tributaries**
Inspector(s):	**Glenn Sakamoto, US EPA Region 9** **Cherie Blatt, North Coast Water Quality Control Board (NC RWQCB)**

BACKGROUND

The Willow Creek Jerseys dairy ("Site") located at **Ex. 6 Personal Privacy (PP)** was part of the North Coast Water Quality Control Board (NC RWQCB) effort to complete inspections for all facilities seeking coverage under one of their permits (i.e. NPDES permit, Waste Discharge Requirement (WDR) state permit, or a conditional waiver for a WDR permit). All dairy facilities in the North Coast must be covered by one of these permits or a waiver from the permit requirement. The North Coast Region contains approximately 150 dairies, housing about 50,000 cows. At the time of the inspection, the NC RWACB had inspected over 100 dairies.

This round of inspections was the first time the state (and EPA) had visited these particular dairies, including the Willow Creek Jerseys. The state was conducting these inspections to determine compliance with waiver requirements and to serve as a reminder to submit their groundwater well and surface water monitoring results. EPA was conducting its inspections to determine whether there are surface water concerns at the Site. While the size of the dairies in Marin and Sonoma are small compared to those in Chino and the Central Valley, they are often located on hills that slope toward creeks and streams. These waterbodies are vulnerable to manure runoff, especially during the rainy season.

The Site is not permitted to discharge pollutants under the Clean Water Act and is operating under a conditional waiver (Conditional Waiver No. R1-2012-003), which allows eligible facilities, including the Willow Creek Jerseys dairy, to operate without a discharge permit. The conditional waiver acts like a permit by establishing best management practices, monitoring and reporting requirements, and other requirements (herein referred to as "conditional waiver" or "conditional waiver of WDR"). The conditional waiver is available to any size operation that poses a low or insignificant risk to surface or groundwater. The NC RWQCB issued the conditional waiver on January 19, 2012, which expires January 19, 2017.

INSPECTION OBSERVATIONS

On April 14, 2014, Glen Sakamoto (US EPA Inspector) and Cherie Blatt (North Coast Regional Water Quality Control Board Inspector) conducted a joint federal/state compliance evaluation inspection of the Willow Creek Jerseys facility to determine compliance with federal and state requirements. Becky Mitschele (US EPA Permitting Specialist), Melissa Lema (Western United Dairymen), and William Hart (Gold Ridge Resource Conservation District) were also in attendance. The inspectors arrived at the Site announced and contacted Mr. Camozzi to begin the inspection. Mr. Camozzi arrived promptly and granted access to the Site. Mr. Camozzi was present throughout the inspection, from the opening conference until the end of the exit interview. Weather at the time of the inspection was about 70°F and sunny.

At the opening conference, Glenn and Cherie asked to inspect the following areas of the Site: the confinement areas, including the stabling area, stormwater conveyances, manure storage and handling areas, the perimeter of the Site, and any surface waters either adjacent to, or that might receive flows from, the Site.

We visited the nearest surface water, unnamed creek (tributary to Estero Americano), immediately adjacent to the perimeter of the Site. The inspectors observed erosion and cow footprints on the creek's banks (see photo 29 and 30).

The Site is an approximately 102-acre organic dairy farm with grazing fields and a production area. The Site has been organic for the last 10-12 years. The Site has been operational since the 1930s, but Mr. Camozzi bought the farm in 1971. Mr. Camozzi stated that he spreads manure and/or process wastewater to all 102 acres using a tank truck or a big gun. The fields are used to grow rye grass (for feed). The Site does not have any fresh water ponds or silage onsite.

Mr. Camozzi reported, at the time of the inspection, 130 milking and dry cows. The facility is permitted for 175 milking and dry cows with another 150 other cows. EPA regulations defines dairy facilities as Large Concentrated Animal Feeding Operations (Large CAFOs) if there are greater than 700 mature dairy cows (40 CFR Part 122.23(b)(2)). The Site does not have a nutrient management plan.

The NC RWQCB has no general permit available for dairies facilities; each such facility that discharges would be required to apply for individual permit coverage. There is a conditional waiver from state permit coverage available from the NC RWQCB. The conditional waiver of WDR permit is a general permit applicable to existing dairy operations that have not expanded (as of 1/19/12). RB 1 requires new or expanding dairies to apply for an individual WDR or individual waiver of WDR permit (as opposed to seeking coverage under the general permit).

The conditional wavier of WDR permit prohibits discharges to surface water and groundwater, requires specific production and land application best management practices, and establishes record keeping and monitoring requirements. Specifically, the waiver permit prohibits:

- Direct discharges to groundwater;
- Discharges of manure and process wastewater to surface water or groundwater;
- Discharges from the production area of stormwater that has come into contact with manure or process wastewater;
- Discharges to surface waters via tile drain lines or irrigation return flows (i.e. tailwater), including irrigation water that comes into contact with process wastewater or manure;

- Discharges from the land application that do not comply with the requirements in the water quality plan (or nutrient management plan for Large CAFOs) and the monitoring and reporting plan;
- Disposal of mortalities in liquid manure or process wastewater systems; and
- Animal access (i.e. direct contact) to surface water within production area.

According to Mr. Camozzi, the facility has not discharged. The inspectors did not observe a discharge at the time of inspection.

The inspectors observed high weed growth on the berms of ponds 1 and 2 (see photo 23 and 24). Mr. Camozzi says he allows cows to graze the ponds once a year to help with vegetation growth.

The inspectors also observed ponded water in several areas in the production area: first, at the area near the freestall barn in the dry manure storage area and then at the area near the rain gutter on the freestall barn. (See photo 11, 18, and 19). This area is located within the 100-year floodplain. (See FEMA map). Also, the lower pasture fields were wet (i.e. standing water).

Mr. Camozzi uses a bridge for the cattle crossing between fields (field 1 and field 2). He removes the bridge around October, prior to the rainy season. (See photo 28). The inspectors noted erosion around the stream banks.

AREAS OF CONCERN

Potential for Unauthorized Discharges:
Because this Site does not have an NPDES permit, discharges from the Site to Waters of the United States are prohibited. The State of California regulates discharges to all "waters of the state," which include both surface waters and groundwater (Porter-Cologne Water Quality Control Act § 13050). Per 27 CCR § 13264(a), no person shall initiate any new discharge of waste to waters of the state prior to issuance of waste discharge requirements or a waiver of such requirements. Part 24 and 25, Prohibitions, of the conditional waiver the Site has been operating under, prohibits the discharge of manure, litter, and process wastewater, or stormwater that has come into contact with manure, litter, and process wastewater. Therefore, the operator must ensure that no discharges to Waters of the United States occur without authorization by the permitting authority.

The inspectors observed high weed growth on the manure ponds. Weed growing on manure ponds should be trimmed regularly to aid in checking the pond for leaks.

Ponded water at the Site may come into contact with manure and other process wastewater. The facility must ensure that all process wastewater and manure is contained onsite. The area near the freestall barn may need to be sloped so that runoff does not drain to the creek. Gutters may need to be redirected to grassy areas to conserve manure capacity and avoid ponding water.

Some of the buildings do not have stormwater gutters (about half) and at some places both onsite and offsite, polluted waters may come into contact with soils (unpaved areas) and may soak into the groundwater. Gutter collect clean stormwater and direct water away from manured areas. Redirecting clean stormwater is one way to preserve manure capacity during heavy storm events.

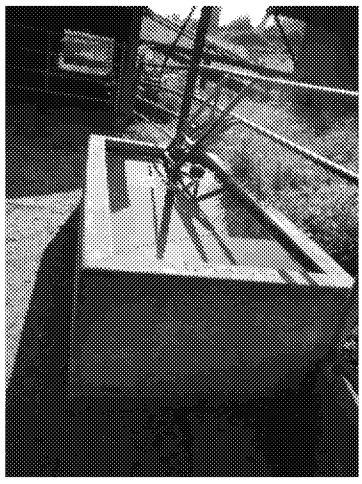
The Site might need additional best management practices near the cattle crossing bridge to ensure that manure and sediment do not enter the creek.

Photographs and Maps

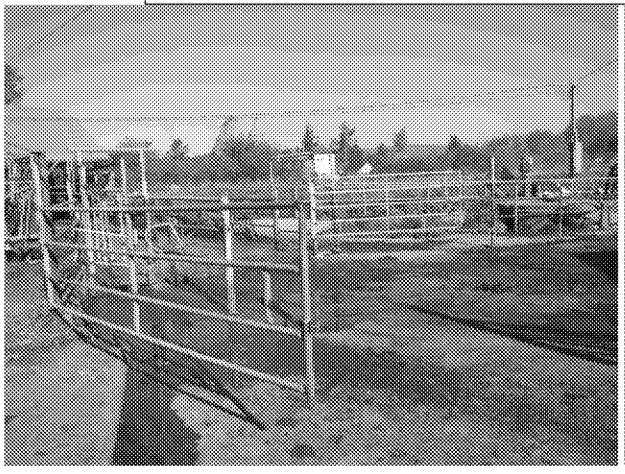
Photo Log - *April 17, 2014 by Cherie Blatt, North Coast Regional Water Quality Control Board*

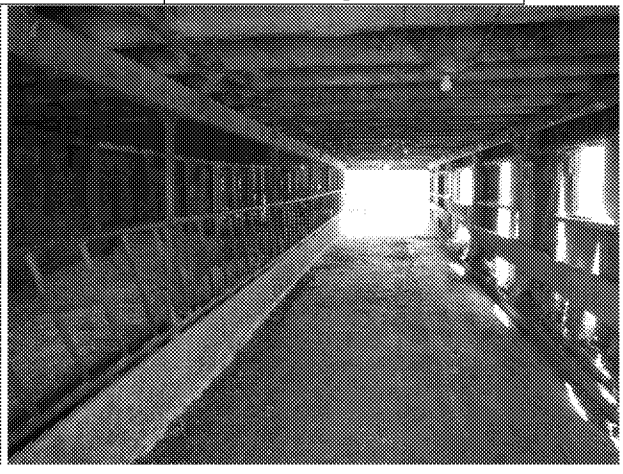
1. Water trough inscription by original dairy operator showing approximate year dairy started.

2. Overview of Willow Creek Jerseys.

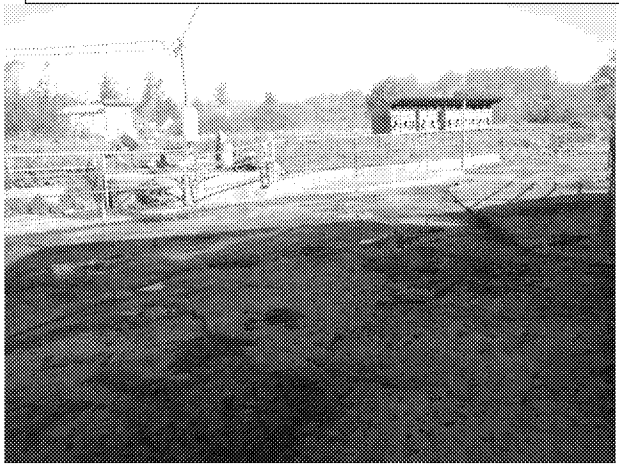


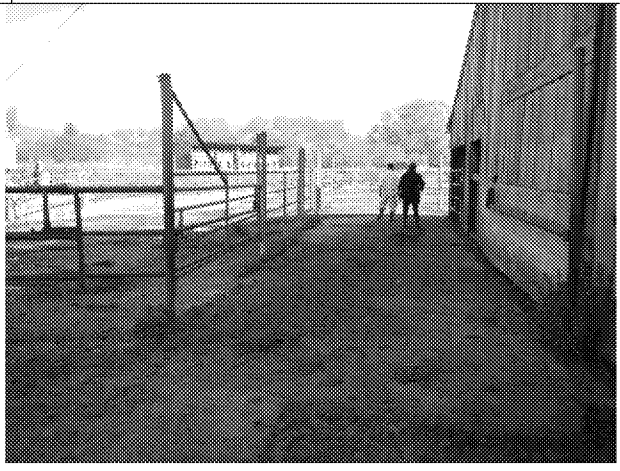
3. Milk Barn.	4. Water trough.



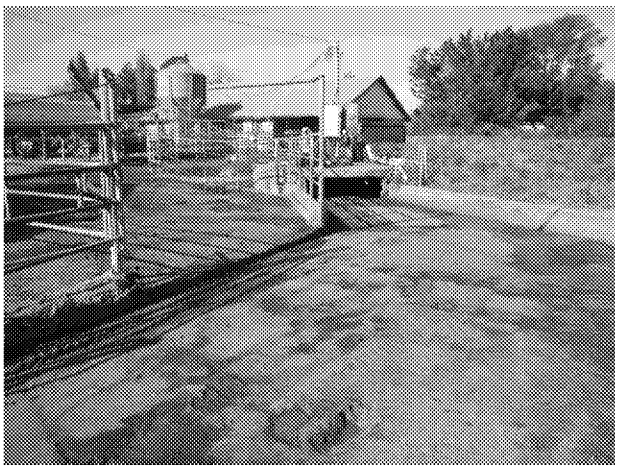


5. Concrete corral and curbs.	6. Barn with scraped lanes.

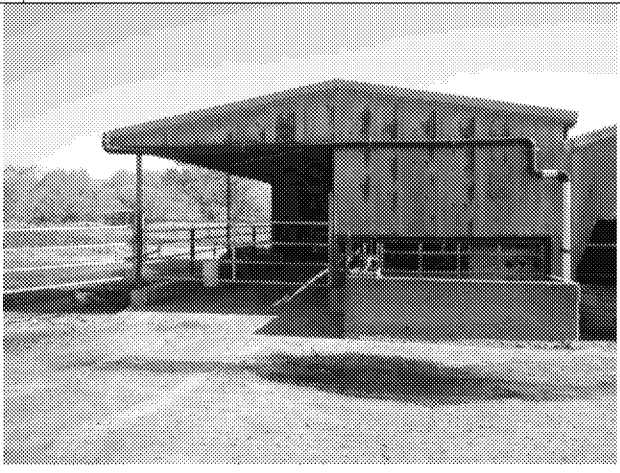




7. Scraped concrete corral with curbs. Note creek riparian zone in background.	8. Concrete lanes and corrals.

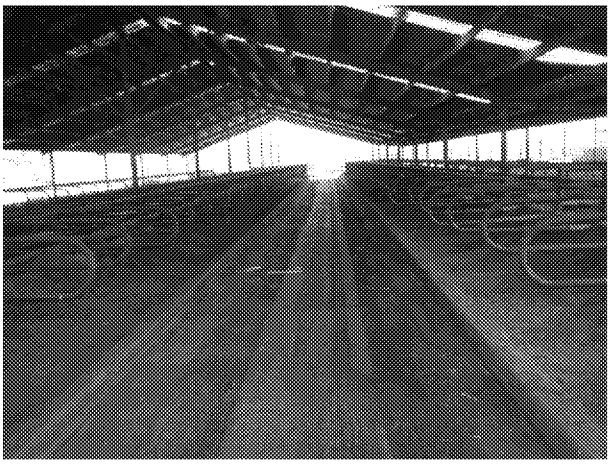


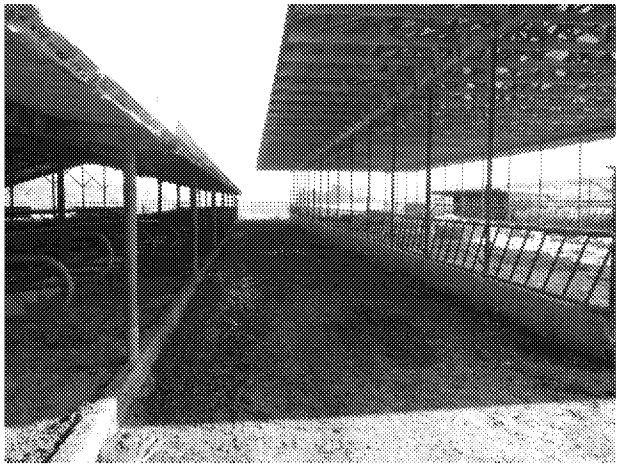
9. Scraped concrete lanes. Note rain gutters on roof.	10. Manure is scraped to pit which is transferred to manure ponds.



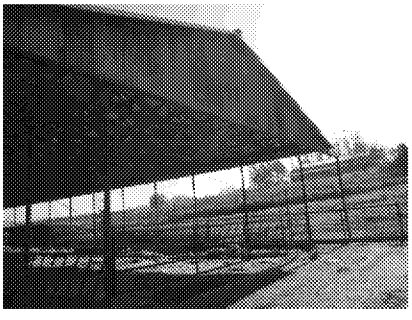
11. Dry Manure Storage Area.	12. Freestall building with gutters.

13. East side of Freestall barn with rain gutters.



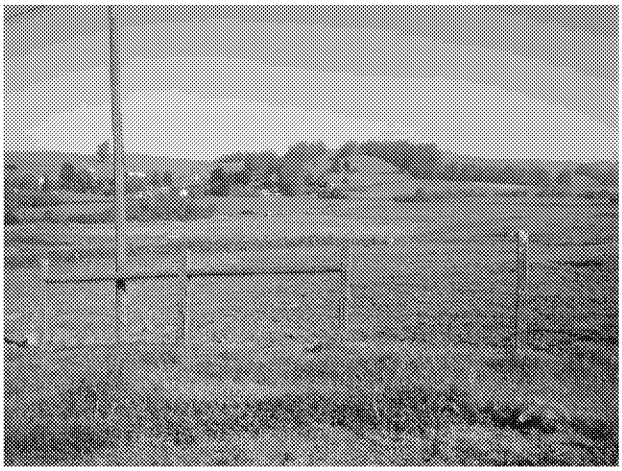


14. Freestall barn with scraped concrete floor.	15. Concrete lane between Freestall barn and new Roofed Feed Area.



16. Roofed Feed Area with downspout.	17. Roofed Feed Area with Downspout.	18. Ponding North of Freestall barns.

19. Ponding North of Freestall barns.

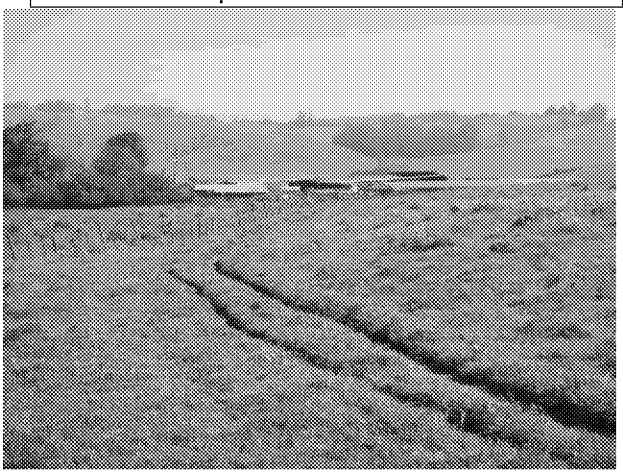


20. Domestic Well near creek.	21. North Pasture.

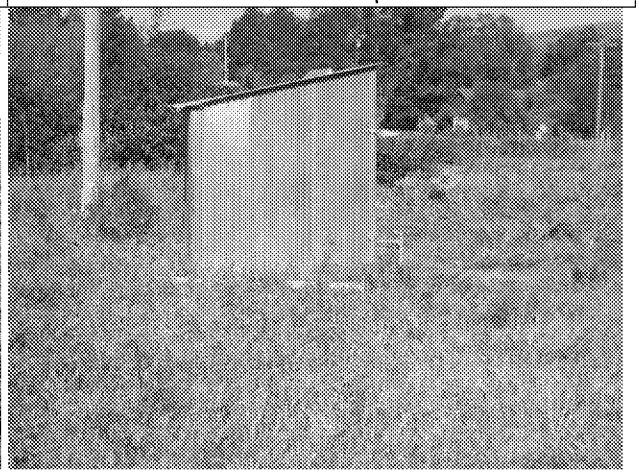
22. Manure Pond 1. Liquids from Pond 1 drain to Pond 2.

23. Manure Liquids Pond 2.

24. North Berm of Manure Liquids Pond 2.



25. Pastures looking Southwest toward Production Area.



26. Domestic Water Supply Well East of creek.

27. Pastures North of Production Area.

28. Bridge cow crossing of creek between pastures, near Domestic Water Supply Well.

29. Creek at bridge.	30. Creek at bridge.

Figure 1. Satellite image from Google Earth of production and surrounding land application fields.

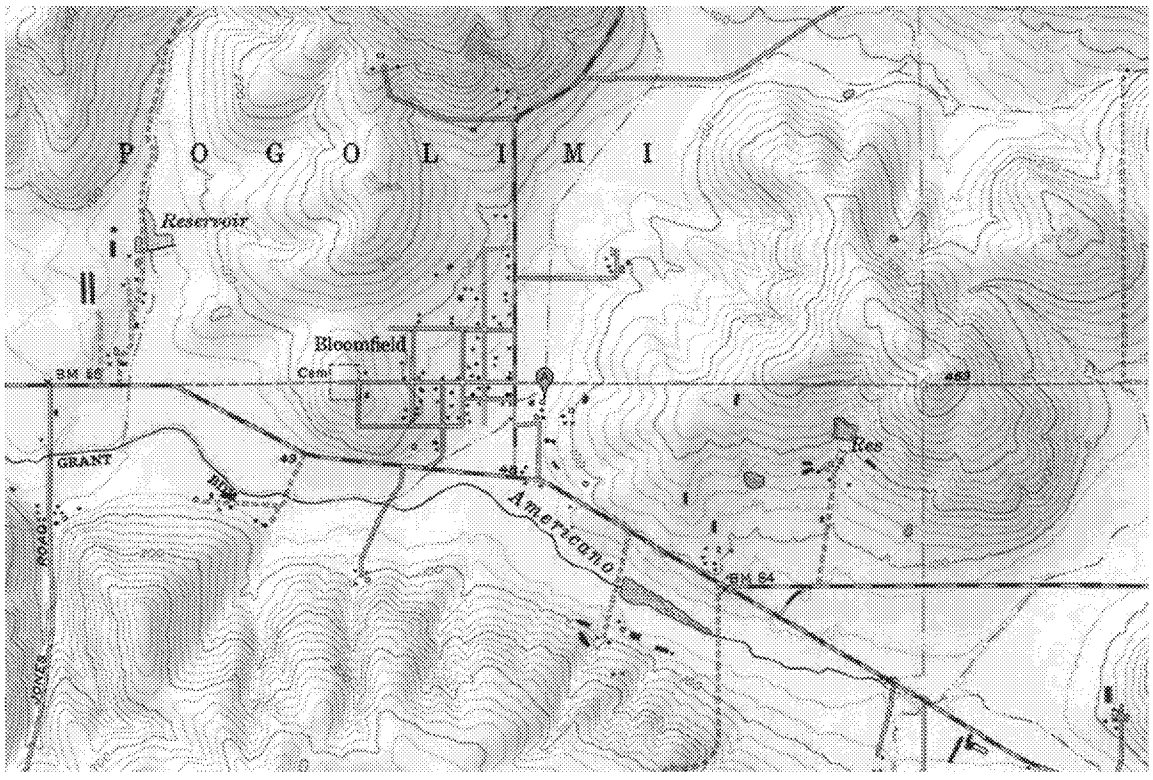


Figure 2. Topographic map.

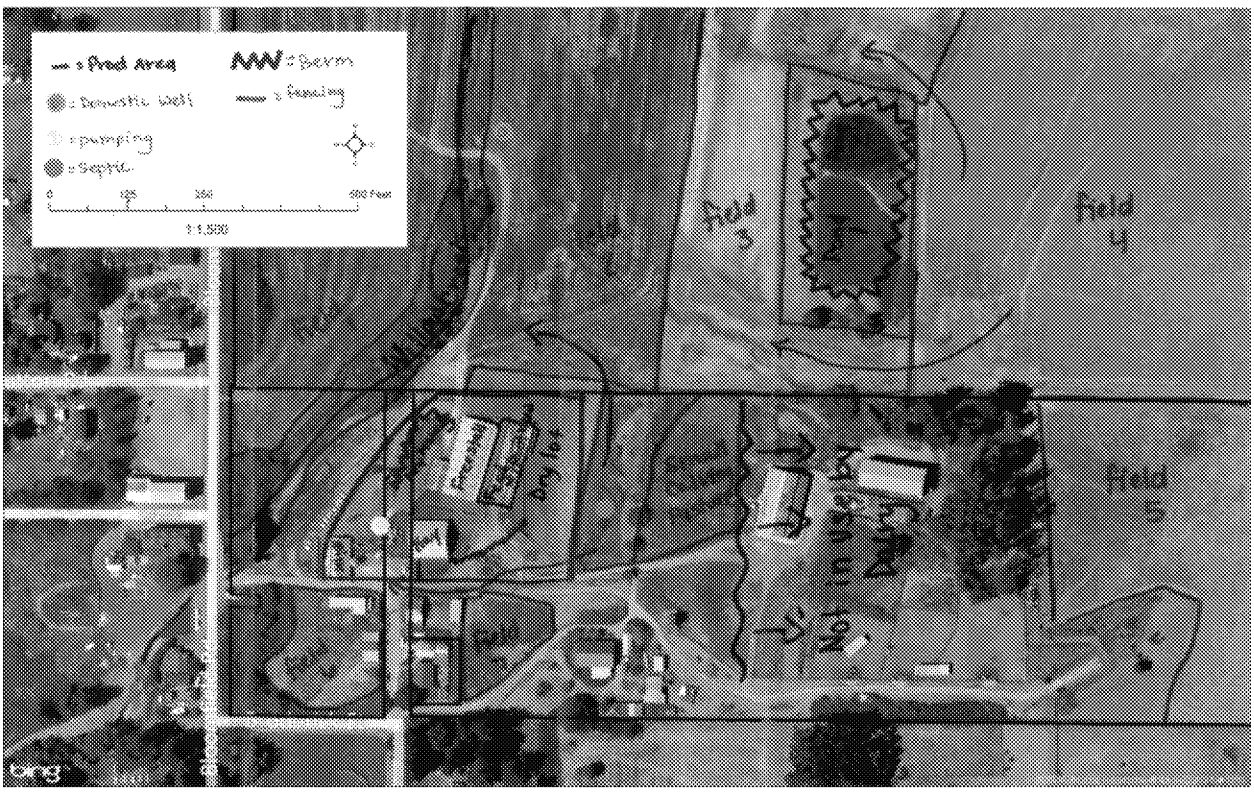


Figure 3. Map of production area showing direction of water flows.

Figure 4. Map of floodplains (FEMA map).